

Meeting Minutes

Subject: Facility Disposition RFCA Standard Operating Protocol

Date: April 10, 2000

Location: Building 060, RFETS

Attendees: Ed Kray, Dave Kruckecheck, Steve Tarleton, Mark Aguilar, Ken Korkia, Mary Harlow, John Marlar, Laura Brooks, Fred Gerdeman, Jeff Stevens, Tom Scott, Dyan Foss, John Corsi

Objective of the Meeting: To answer questions regarding the Facility Disposition RSOP and get a preliminary list of concerns from the public prior to submitting the document for formal public comment

Meeting was chaired by: Jeff Stevens

File: Administrative Record

The meeting was an informal roundtable in which everyone asked questions. The following is a summary of the questions/concerns asked/expressed during the meeting:

- There were many questions regarding the level of detail in the document. Since only one RSOP has been developed, there was a free discussion about how much detail is appropriate for an RSOP. It was determined that the document should contain controls, but it should not try to duplicate the requirements and controls contained in other RFETS documents/programs. However, the document should contain sufficient detail to ensure that the activity can be protective of human health and the environment. It was agreed that the RSOP's current level of detail is probably sufficient.
- There were many questions regarding the transition between Environmental Restoration (ER) and Decommissioning. This included a discussion on removing the facility 3 feet below grade and the remediation of under building contamination. The Building 771 Project was used as a specific example to explain the transition with ER and particularly how the slab and under building contamination would be handled. It was agreed that the document is weak in this area and that additional information would be included in the document before the public review.
- There were questions regarding how work is conducted at RFETS, particularly for work control. A discussion was held on the Integrated Work Control Process, Project Management Plans, and OSHA Demolition Plans. There was interest in the Project Management Plans (PMPs) and assurances were given that the public and regulators would get copies of the drafts PMPs, so they could see the kind of information the PMPs will contain.
- There were concerns that the Type 3 buildings were being considered the same as the Types 1 and 2 buildings. It was pointed out that the RSOP reiterates the requirement for Decommissioning Operating Plans (DOPs), and that the RSOP will not take the place of the DOPs. It was also pointed out that the current planning baseline is that the Type 3

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buildings will be decontaminated to free release status. Therefore, when the RSOP is implemented, the building will essentially be a Type 1 building.

- The State and EPA indicated that they are not comfortable with using the RSOP for the demolition of contaminated buildings. The State and EPA did not think the controls stated in the RSOP are sufficient, but they were unable to indicate what kinds of controls would be sufficient. Assurances were given that this topic would be reviewed prior to going out for public comment.
- As follow-on to the contaminated demolition discussion, there were attempts made to bound the condition by the size and amount of contamination, but no consensus could be reached. The air and water controls outlined in the RSOP were discussed in detail, particularly the requirement for air calculations and the programs and procedures onsite to maintain compliance with these programs.
- There were concerns expressed about the use of explosives. Additional explanation was given on why explosives might be necessary given the age of the facilities and the safety of the workers. The Building 771 stack was used as a specific example. Although everyone appeared to be more comfortable about this subject; it was agreed that additional information would be included in the RSOP before the public comment period.
- A discussion was held on the implementation of the RSOP and the continued regulator and public involvement. It was explained that the consultative process would be used throughout the RSOP implementation, but it was agreed that additional clarification language was needed before the document goes out for public review. Ed Kray and Mark Aguilar agreed they would develop what they would need to be more comfortable with the RSOP process.
- A discussion was held on the disposition of facilities to at least 3 feet below grade and the potential surface and groundwater impacts. It was agreed that some additional language needed to be added on the potential surface and groundwater impacts before the document goes out for public review.